

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

ZANDRA THORNTON,)	
)	
Plaintiff,)	
)	
vs.)	CIVIL ACTION NO.
)	1:06-cv-162-WKW
JC PENNY COMPANY, INC., et al.,)	
)	
Defendants.)	

REPORT OF PARTIES DISCOVERY PLANNING MEETING

1. Pursuant to Fed. R. Civ. P., 26(f), a meeting was held by telephone conference on April 3, 2006 between Steven Hamner, Counsel for the Plaintiff, and Eris Bryan Paul, Counsel for the Defendant.

2. Pre-Discovery Disclosures. The parties will exchange by April 17, 2007, the information required by Fed. R. Civ. P. 26(a)(1).

3. Discovery Plan. The parties jointly propose to the Court the following discovery plan.

A. Discovery will be needed on the following subjects: Plaintiff's claims and Defendant's defenses;

B. All discovery shall be commenced in time to be completed by November 29, 2006; A final list of witnesses shall be exchanged on or before October 29, 2006.

C. A maximum of 40 interrogatories by each party to the other party;

D. A maximum of 20 requests for admissions by each party to the other party;

- E. A maximum of 40 requests for production by each party to any other party;
 - F. A maximum of 10 depositions by Plaintiff and 10 depositions by Defendant;
 - G. Reports from retained experts under Rule 26(a)(2) shall be due:
 - From Plaintiff by August 29, 2006;
 - From Defendant by September 29, 2006;
 - H. Supplementations under Rule 26(e) due 30 days after receipt of information.
4. Other items:
- A. The parties do not request a telephone conference with the Court before entry of the scheduling order.
 - B. The parties do not request a pretrial conference prior to the entry of this scheduling order.
 - C. Plaintiff should be allowed until June 1, 2006, to amend the pleadings.
 - D. Defendant should be allowed until July 1, 2006, to amend the pleadings.
 - E. All potentially dispositive motions should be filed by October 29, 2006, Settlement cannot be evaluated prior to the close of discovery. Parties request a final pretrial conference on or about December 29, 2006.
 - F. Final lists of exhibits shall be due 21 days before trial.
 - G. Parties shall have 10 days after service of final lists of witnesses and exhibits to list objections.

H. The case should be ready for trial by January 29, 2007, and at this time is expected to take approximately 1- 2 days.

/s/ Stephen R. Hamner

STEPHEN R. HAMNER

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/s/ Eris Bryan Paul

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